REMARKS

Favorable reconsideration of this application as presently amended and in light of the following discussion is respectfully requested.

Claims 1-14 are pending in the present application. Claims 1-9 are amended and Claims 10-14 are added by the present amendment.

New Claims 10-14 recite features similar to those in originally filed Claims 1-5, respectively, but are rewritten without using means-plus-function language. It is believed no new matter is added.

In the outstanding Office Action, Claims 1-9 were rejected under 35 U.S.C. § 112, second paragraph; Claims 1-5 were rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent No. 5,649,218 to Saito in view of U.S. Patent No. 6,526,410 B1 to Aoyama et al. (herein "Aoyama"); and Claims 6-9 were rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent No. 6,535,875 B2 to Takahashi et al. (herein "Takahashi") in view of U.S. Patent No. 6,230,173 B1 to Ferrel et al. (herein "Ferrel").

Regarding the rejection of claims under 35 U.S.C. § 112, second paragraph, Claims 1-9 are amended in light of suggestions in the outstanding Office Action. Accordingly, it is respectfully requested that rejection be withdrawn.

Claims 1-5 were rejected under 35 U.S.C. § 103(a) as unpatentable over Saito in view of Aoyama. That rejection is respectfully traversed.

Amended Claim 1 is directed to a document editing system for editing a document in a computer. The document editing system includes means for discriminating a specified plurality of document areas within an arbitrary area of the document and managing the specified plurality of document areas along with attributes assigned to the document areas. The document editing system also includes means for managing generation and deletion of a tag pair. The tag pair includes a start tag and an end tag and a unique identifier which is

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attached to each start and end tag. The unique identifier is different from a unique identifier attached to each other tag pair. In addition, the document editing system includes means for editing a character sequence provided in the document while information about the specified plurality of document areas within the document is retained or updated.

In a non-limiting example, Figure 1 illustrates a document editing system that includes document area management means (1) (e.g., means for discriminating and managing), tag management means (2) (e.g., means for managing generation and deletion), and document editing means (3) (e.g., means for editing a character sequence). Figures 2 and 3 illustrate examples of documents edited by the document editing system that each include two tag pairs that are managed by the tag management means (2). The tag pairs are used to identify document area A and document area B, for example. In the examples of Figures 2 and 3, document area A is identified by start and end tag pair r having a unique identifier "1". Further, in Figures 2 and 3, document area B is identified by another start and end tag pair r having a unique identifier 2.

A document editing system thus arranged advantageously improves the degree of freedom in appending attributes to a document because areas of the document can be uniquely distinguished from one another, and this representation method allows greater flexibility in representing the attributes of the document areas.[1] Further, by using a unique identifier for each tag pair this arrangement advantageously allows editing of documents having document areas which are nested or which partially overlap even when using tags of the same type. For example, as shown in Figure 2, although document areas A and B overlap and have the same type "r", the unique identifiers associated with each document area allow the start and end of each area to be uniquely identified.

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[1] Specification at page 2, lines 16-23.

Applicants respectfully submit that the combined teachings of <u>Saito</u> and <u>Aoyama</u> do not teach or suggest a tag management means that includes start tags and end tags having a unique identifier that is different from a unique identifier attached to each other tag pair. In particular, applicants respectfully submit that <u>Saito</u> only discloses a document structure retrieval apparatus that allows documents to be stored using tags that may be partially omissible. In other words, <u>Saito</u> discloses a system that operates even when some end tags are missing from the document. However, Applicants respectfully submit that <u>Saito</u> does not disclose a system that includes a unique identifier attached to each start and end tag. On the contrary, <u>Saito</u> discloses using only the non-unique tag name (i.e., tag type) to identify each start tag. For example, see Figure 14 of <u>Saito</u> which includes two start tags non-uniquely identified as "chap" and three start tags non-uniquely identified as "para".

Likewise, Applicants respectfully submit that <u>Aoyama</u> also teaches only the conventional approach of using start and end tags identified by their name or type and does not disclose start and end tags each with a unique identifier. For example, in Figure 14B, <u>Aoyama</u> discloses using the same start and end tag pair "CHAPTER NUMBER" in two places within the example document.

Accordingly, it is respectfully submitted that the combined teachings of <u>Saito</u> and <u>Aoyama</u> do not teach or suggest "means for managing generation and deletion of a tag pair including a start tag and an end tag, and a unique identifier which is attached to each start and end tag, wherein said unique identifier is different from a unique identifier attached to another tag pair," as in independent Claims 1 and 10.

Accordingly, it is respectfully submitted that independent Claims 1 and 10 and claims depending therefrom are allowable.

Claims 6-9 were rejected under 35 U.S.C. § 103(a) as unpatentable over <u>Takahashi</u> in view of <u>Ferrel</u>. That rejection is respectfully traversed.
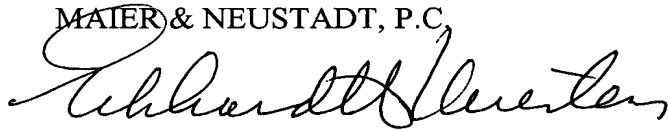
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Applicants respectfully submit that Takahashi also does not teach or suggest

specifying a plurality of document areas which are nested or which partially overlap through

use of tags of the same type. Further, it is respectfully submitted that Takahashi does not

teach or suggest using tag pairs with unique identifiers. For example, in Figure 5 Takahashi

teaches using start and end tags identified only by their name or type and without unique

identifiers as evidenced by the use of non-uniquely tags "name" and "para" several times

throughout this example. Accordingly, it is respectfully submitted that the combined teaches

of Takahashi and Ferrel do not teach or suggest "assigning a non-overlapping *unique* tag ID

to the tag information pieces" (emphasis added), as recited in Claim 6, and as similarly

recited in Claims 7-9.

Accordingly, it is respectfully submitted that independent Claims 6-9 are allowable.

Consequently, in light of the above discussion and in view of the present amendment,

the present application is believed to be in condition for allowance and an early and favorable

action to that effect is respectfully requested.

Respectfully submitted,

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